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Attorneys for Defendant
MADISON REED, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JENNIFER CONIDI, individually and on behalf of all others similarly situated,

Case No. 2:23-cv-02823-AB-AFM

Plaintiff,

vs.

MADISON REED, INC., a Delaware corporation; and DOES 1 through 10, inclusive.

Defendants

**JOINT NOTICE OF SETTLEMENT
IN PRINCIPLE AND STIPULATION
TO STAY CASE**

1 Jennifer Conidi (“Plaintiff” or “Conidi”) and Defendant Madison Reed, Inc.
2 (“Madison Reed”) hereby stipulate as follows:

3 1. Pursuant to LR 40-2, the Parties have reached an agreement in principle
4 to settle this action and are in the process of preparing a formal settlement
5 agreement.

6 2. Pursuant to the Parties’ Stipulation Extending Time to Answer, Madison
7 Reed’s deadline to file responsive pleading is May 19, 2023.

8 3. However, in light of the settlement in principle, such pleading is
9 unnecessary.

10 4. Once the settlement agreement is finalized and executed, Plaintiff will
11 voluntarily dismiss the action with prejudice.

12 THEREFORE, in light of the foregoing and to further judicial economy, the
13 Parties stipulate staying this action while finalizing the settlement agreement. The
14 parties will jointly inform the Court of their status within 30 days if the matter has
15 not yet been dismissed.

16
17 Dated: May 18, 2023

Respectfully Submitted

18 SHOOK, HARDY & BACON L.L.P.

19 By: /s/ Jessica N. Wahl

20 Attorneys for Defendant
MADISON REED, INC.

21
22 Dated: May 18, 2023

Respectfully Submitted

23 PACIFIC TRIAL ATTORNEYS, P.C.

24 By: /s/ David Reid

25 Attorneys for Plaintiff
JENNIFER CONIDI, individually and on
26 behalf of all others similarly situated

SIGNATURE ATTESTATION

Pursuant to L.R. 5-4.3.4(a)(2), I attest that all signatories on whose behalf this filing is submitted concur in the content of this filing and have authorized the filing, including the use of /s/ electronic signatures.

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

Dated: May 18, 2023

By: /s/ Jessica N. Wahl

Attorneys for Defendant
MADISON REED, INC.